Post

9/24/07 Mary P Levine Acting General Counsel/ Director of Legal Affairs Michigan State Housing Development Authority P. O. Box 30044 Lansing, Michigan 48909



Dear Counselor Levine:

I am writing this letter in response to the request fir public comment on the Qualified Allocation Plan.

First of all I support MSHDA's language on the Plan that on page 15 A.1 that reads "10% of all units in any given project shall be given leasing priority for supportive housing tenants with rents with rents structured at or below 30% of Average Median Income." Furthermore, I commend MSHA on assisting those with low incomes by requiring that "10% of the low income housing tax credit units in a development must have income and rents set at \$40% of AMI and 10% of units at 30% of AMI." (pg.19).

These strategies to provide both low-income people with affordable, decent housing will need creative financial incentives to make them a reality. Some of the incentives might include the following:

- Attach vouchers to supportive housing units
- Housing funded through CMH, HUD, or other financial sources
- Increase tax credit on the 30% of AMI units
- Flexible requirements remain intact for small projects of less the 25 units
- Provide incentives so that projects continue to serve low income families well into the Future

The above suggestions would go along the way in assuring the financial stability of any project.

In addition, my concern involves persons with disabilities. I advocate that the QAP definition of Special Needs/ Supportive put aside units for persons with disabilities of all ages who are transitioning from nursing facilities, AFC Homes, and Homes for the Aged. As a consequence of the decreasing mobility of our aging population and our veterans with disabilities returning home I challenge MSHDA to raise the standards for units that have accessible features. These units should comply with Public ACT 182, which states that each unit should be built according to the Type B (adaptable to useable) dwelling specifications of the Michigan Construction Code. This requirement will result in a more flexible community housing stock.

Lastly, I am concerned about the geographic targeting suggested in the QAP. In many medium sized municipalities, low income housing tax credit projects would be excluded. These vital housing units should not be squeezed into specific areas creating "ghetto communities" but should be integrated

throughout the state to facilitate consumer choice for both developers/tenets. I recommend that MSHDA look at the broader metropolitan area for its planning purposes.

In closing, I believe all people have the right to safe, affordable, decent, accessible, housing. Secure housing is a mainstay of American community living. By acting on these suggestions more people with disabilities and those with low incomes will be able to participate more fully in their chosen communities.

Sincerely,

Lammy Germans

Housing Advisory Committee Volunteer

Disability Advocates Kent County